

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

STATE FARM FIRE AND CASUALTY	:	
COMPANY a/s/o Robert Roehm and	:	
Patricia Roehm	:	
Plaintiff,	:	C.A. No. 02-CV-4019
	:	
v.	:	
	:	
ELECTROLUX and LOWE'S HOME	:	
CENTERS, INC.	:	JURY TRIAL DEMANDED
Defendant.	:	

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**PLAINTIFF STATE FARM FIRE & CASUALTY COMPANY'S  
MOTION TO EXTEND DISCOVERY**

AND NOW, this 26<sup>th</sup> day of March 2003, comes the Plaintiff State Farm Fire & Casualty Company (hereinafter State Farm) files the following Motion to Extend Discovery.

For the reasons stated herein, State Farm respectfully requests that this Honorable Court grant its Motion to Extend Discovery for a period of sixty (60) days.

1. State Farm hired Carl Natale, President of UBA Fire Incorporated to conduct additionally testing, and draft a protocol for destructive testing and inspection of the product in questions with Defendants' experts.

2. In late February, Ms. Mara Shall, from the office of Carl Natale, UBA Fire Incorporated, informed the undersigned counsel that Mr. Natale's wife was in critical condition due to lung cancer and that Mr. Natale cleared his calendar for the entire month March to provide care for Mrs. Natale in her last days. Mr. Natale was Mrs. Natale sole care provider.

2. On March 10, 2003, undersigned counsel was informed that Mrs. Natale had died.

3. According to Ms. Mara Shall, Mr. Natale is still unavailable through the end of April 2003.

4. Through coordination with Mr. Natale's office, State Farm has a hired a new electrical engineer, James Schroeder to conduct destructive testing and provide an expert report.

5. Mr. Scheoder needs additional time to review the file and prepare a protocol for destructive testing and inspect the defective product.

5. In addition to the unexpected circumstances mentioned above, Defendants do not oppose State Farm's Motion to Extend Discovery.

7. Due to the unexpected circumstances mentioned above, and that Defendants do not oppose the State Farm's Motion to Extend Discovery, Plaintiff requests this Honorable Court grant its Motion to Extend Discovery.

WHEREFORE, Plaintiff State Farm Fire & Casualty Company respectfully requests this Honorable Court grant its Motion to Extend Discovery for sixty (60) days.

FREY, PETRAKIS, DEEB, BLUM  
BRIGGS & MITTS, P.C.

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